

Reply to the Comments of Dr. J. G. Welsh/MOTOROLA

Paragraph C/Appendix C:

The study of A. Faraone presented in Appendix C is well conducted. He has taken the appropriate approach to derive a power limit for an exclusionary clause, namely by analyzing worst-case scenarios. The conclusion, however, that an exclusionary clause of 10mW is consistent with the safety guidelines (basic restrictions) is only correct if the antenna cannot be operated closer than 10mm to the body. The data do not support any exclusion for distances closer than 10mm. For example, at 5mm distance, the spatial peak SAR may increase by considerable more than a factor of 2.

In order to avoid unnecessary testing, we would like to recommend to the FCC to release distance-dependent and perhaps frequency-dependent exclusionary clauses based on worst-case considerations.

It should also be noted that the data of Dr. Faraone are consistent with the comments of the IT'IS Foundation: that the 100mW exclusion is ill-advised. Please also be aware that the utilization of low impedance antenna structures in RF devices operating close to the body is not unrealistic.